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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

DECLARATION OF JEFF NARDINELLI

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. I participated in a conference call involving Special Master Cooper and counsel on
7 June 16, 2017. On that call, I discussed Waymo's similar responses to 37 Uber RFPs with Uber
8 attorney Scott Llewellyn. I explained to Mr. Llewellyn that Waymo's response was broad enough
9 to cover the subject matter of each RFP.

10 3. Mr. Llewellyn did not protest that explanation but stated that in Uber's review of
11 Waymo's production, Uber had not seen documents responsive to the requests. I explained that
12 Waymo had not yet produced the documents that it had searched for and located specifically in
13 response to those RFPs, but would produce such documents that day. On June 16, 2017, Waymo
14 produced documents responsive to the 37 RFPs. On June 26, 2017, Waymo produced additional
15 documents responsive to the 37 RFPs.

16 4. To respond to the 37 RFPs, Waymo collected documents from a Google Drive
17 repository identified by team lead Pierre-Yves Droz as containing information relating to
18 Waymo's LiDAR development. Waymo additionally collected documents from several LiDAR
19 engineers and ran search terms to locate additional responsive documents. Waymo's collection,
20 review, and production is ongoing.

21 5. Waymo is searching documents of its LiDAR personnel for the term *trade /2*
22 *secret**.

23 6. Attached as Exhibit 1 is a true and correct copy of an email I sent to counsel in this
24 action, dated June 16, 2017.

25 7. Attached as Exhibit 2 is a true and correct copy of a Consent Decree dated March
26 18, 2011.

27 8. Attached as Exhibit 3 is a true and correct copy of an email exchange between
28 counsel in this action, dated June 16, 2017.

1 9. Attached as Exhibit 4 is a true and correct copy of excerpts of the deposition of
2 Cameron Poetzscher, taken June 19, 2017.

3 10. Attached as Exhibit 5 is a true and correct copy of an email I sent to counsel in this
4 action, dated June 26, 2017.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7
8 DATED: June 27, 2017

/s Jeff Nardinelli
Jeff Nardinelli